

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TENNESSEE
KNOXVILLE DIVISION

LINDA CALHOUN,)
Plaintiff,)
v.)
WALGREENS CO. AND JOSHUA PIERCE,)
Defendants.)
Case No. 3:20-cv-00210

**JOINT MOTION TO STAY ALL DEADLINES FOR RESPONDING TO
PLAINTIFF'S COMPLAINT, AND OTHERWISE STAY ACTION,
PENDING MEDIATION**

COME NOW, Plaintiff and Defendants, by and through their undersigned counsel, and hereby file this Joint Motion to Stay All Deadlines for Responding to Plaintiff's Complaint, and Otherwise Stay Action, Pending Mediation ("Joint Motion to Stay"). In support of this Motion, the Parties state as follows:

1. Plaintiff served her Complaint in the above-referenced matter on June 2, 2020.

2. Since that time, counsel for the Parties have been engaged in extensive discussions regarding this case, and Defendants have filed a Stipulation for Extension of Time to Respond to Complaint (Doc. 6) and two Unopposed Motions for Extension of Time to Answer (Docs. 7, 9). Defendants' current deadline to respond to the Complaint is August 13, 2020 (Doc. 10.). Defendant Walgreen Co. ("Walgreens") has also provided numerous documents to Plaintiff in an attempt to resolve this matter.

3. Recently, the Parties agreed to submit this case to mediation. Counsel are currently working to schedule mediation.

4. Attempting mediation to resolve this case before proceeding further is consistent with the interests of judicial economy and in the best interests of the Parties.

5. If the Parties are able to successfully mediate this case, this action will be dismissed with prejudice, and the Court will not have to take any further action to adjudicate this case.

6. Further, if the Parties successfully mediate this case, any answer, pleading, motion, or other response to Plaintiff's Complaint by Defendants will be unnecessary.

7. The Parties, therefore request, that this Honorable Court stay this action, including any and all deadlines of Defendants for responding to Plaintiff's Complaint, pending outcome of the mediation. If the parties are able to resolve this case in mediation, they will promptly file a Joint Stipulation of Dismissal. If the Parties are unable to resolve this case in mediation, either Party will file a motion with the Court to lift the stay, and the Parties request that the Court provide Defendants with three (3) weeks from the date such mediation fails to file their answer, pleading, motion, or other response to Plaintiff's Complaint.

8. By October 15, 2020, the Parties will provide the Court with a Joint Status Report related to the mediation effort, or will move to lift the stay.

WHEREFORE, the Parties hereby move this Honorable Court to grant their Joint Motion to Stay, staying Defendants' deadline for any answer, pleading, motion, or other response to Plaintiff's Complaint pending the parties' mediation and, if such mediation is unsuccessful, granting Defendants three (3) weeks from the date mediation fails to file their answer, pleading, motion, or other response to Plaintiff's Complaint with this Court.

Dated this 12th day of August 2020.

AGREED AND STIPULATED BY:

JENNIFER MORTON LAW, PLLC

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*Attorneys for Defendants Walgreens Co. and
Joshua Pierce*

CERTIFICATE OF SERVICE

I hereby certify that on August 12, 2020, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon the following:

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